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March 28, 2008

Via Fax: 212-805-7941

Hon. Loretta A. Preska
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl St., Room 2510
 New York, NY 10007

Re: Sharon Garcia v. The City of New York, et al.
07CV4777

Hon. Loretta A. Preska:

This is a joint application for an extension of the discovery deadline in this matter. Document demands and responses have been served in this matter which have shed some light on the incident which is the subject of this lawsuit. However, the plaintiff's counsel is still attempting to locate the transcript of the warrant application. To date, we are not in receipt of those minutes. Both counsel are not currently aware of which or how many witnesses testified before the issuing magistrate. The undersigned is of the opinion that this information is extremely relevant in order to ascertain what information the issuing magistrate had before it when it issued the warrant at issue in this matter.

Depositions have not yet been conducted. However, plaintiff is available for her deposition on fairly short notice. Defense counsel has not indicated whether officer who testified before the magistrate is available for a deposition on short notice.

The parties have discussed a modest settlement in this matter and discussions are continuing.

Therefore, counsel for the respective parties request that discovery be extended in this matter until May 30, 2008 and that a conference be held sometime in June of 2008. The discovery deadline is currently March 31, 2008 and was not previously adjourned. In addition, counsel request an extension of all other deadlines in this matter, including the deadline to submit a letter to the Court indicating an intention to file a Summary Judgment motion.

Thank-you in advance for your consideration

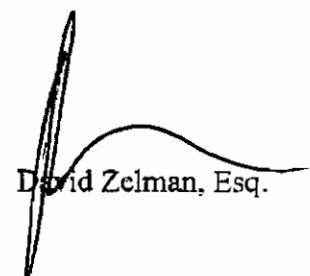
*a conference will be held on June 17 at 9:00 a.m.
 no further extensions will be granted
 without good cause.*

March 28, 2008

Sincerely,

SO ORDERED

Loretta A. Preska
 LORETTA A. PRESKA
 UNITED STATES DISTRICT JUDGE



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To:
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